

**IN THE UNITED STATES DISTRICT COURT  
OF THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

# ROBERT INZER

## Plaintiff

**V.**

**HEALTH CLAIMS PROCESSING, INC..  
LIBERTY-DAYTON HOSPITAL, INC.,  
LIBERTY-DAYTON COMMUNITY  
HOSPITAL, L.P., AND FRONTIER  
HEALTHCARE GROUP, INC.**

## Defendants.

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**C.A. No. 1:04CV0628**

## JUDGE HEARTFIELD

**JOINT MOTION TO DISMISS WITH PREJUDICE**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT:

COME NOW, Plaintiff, ROBERT INZER (hereinafter referred to as “INZER”) and HEALTH CLAIMS PROCESSING, INC., (hereinafter referred to as “HCP”); LIBERTY-DAYTON HOSPITAL, INC., (hereinafter referred to as “LDH”), LIBERTY-DAYTON COMMUNITY HOSPITAL, L.P., (hereinafter referred to as “LDCH”), FRONTIER HEALTHCARE GROUP, L.L.C. and FRONTIER HEALTHCARE GROUP, INC., (hereinafter referred to as “FRONTIER”) (hereinafter collectively referred to as the “DEFENDANTS”). and file this their Joint Motion to Dismiss With Prejudice and in support thereof and would respectfully show as follows:

1. The parties have entered into an agreement settling all matters in controversy between

the parties and no long desire to pursue this action. The parties request that any and all claims and counter-claims be dismissed in their entirety with prejudice with each party paying its own costs and attorneys fees.

WHEREFORE, premises considered Plaintiff, ROBERT INZER and Defendants HEALTH CLAIMS PROCESSING, INC., LIBERTY-DAYTON HOSPITAL, INC., LIBERTY-DAYTON COMMUNITY HOSPITAL, L.P., FRONTIER HEALTHCARE GROUP, L.L.C. and FRONTIER HEALTHCARE GROUP, INC., pray that this Honorable Court dismiss with prejudice any and all claims and counter-claims herein and for such other and further relief at law or in equity to which they may show themselves justly entitled.

Respectfully submitted,

**KERR & HENDERSHOT, P.C.**

/s/ Robin N. Blanchette  
by permission, John Werner

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HEALTH CLAIMS PROCESSING, INC.**

**KELLY HART & HALLMAN**

/s/. Jason Nash by permission, John Werner

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**ATTORNEY FOR DEFENDANTS,  
LIBERTY-DAYTON COMMUNITY HOSPITAL, L.P.  
and FRONTIER HEALTHCARE GROUP, INC.,  
FRONTIER HEALTHCARE GROUP, L.L.C.**

**REAUD, MORGAN & QUINN, L.L.P.**

/s/. John Werner

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**ATTORNEY FOR PLAINTIFF,  
ROBERT INZER**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was sent via facsimile and by certified mail, return receipt requested, on the 19th day of September 2005, to the following:

John Werner  
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Via Electronic Filing

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/s/ Robin N. Blanchette  
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